

# **EXHIBIT 1**

**CHRISTOPHER WU**  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
CASE NO. 7:17-cv-06251-PMH-AEK

HARRIET LOWELL and WESTCHESTER DISABLED  
ON THE MOVE, INC., individually and on  
behalf of all others similarly situated,

Plaintiffs,

- against -

LYFT, INC.,

Defendant.

October 26, 2021  
10:35 a.m.

VIDEOTAPED DEPOSITION DRAFT of  
CHRISTOPHER WU, held REMOTELY, before Victoria  
Russo, a Certified Shorthand Reporter and Notary  
Public within and for the States of New York and  
New Jersey, commencing on the above date and time.

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1 JMac and Brian Roberts.

2 Q. Why don't we turn to Page ILRC22626.

3 MS. LEE: What page is that in the  
4 PDF?

5 MR. FREI-PEARSON: I believe it is  
6 Page 10.

7 A. Okay.

8 Q. Do you see where the presentation  
9 states "we are currently incentivized to keep WAV  
10 programs as small as possible while meeting  
11 regulatory requirements. Our big risk is being  
12 forced to scale. Regulations are shaped with the  
13 correct assumption that we will do as little as  
14 possible unless forced."

15 A. I see it.

16 Q. Is it true that the correct assumption  
17 is that Lyft will do as little as possible with  
18 regard to WAVS unless forced?

19 MS. LEE: Argumentative.

20 A. Is it true that Lyft will do as little  
21 as possible unless forced? I mean I think at this  
22 time with the appetite the company had this was  
23 probably true not related to health care transit  
24 university opportunities like in Austin, in Boston,  
25 but that was, you know, that was at that time.

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1 Q. Are you aware of that ever changing?

2 A. I don't know. I'm not aware, but I  
3 haven't been there in so long.

4 Q. Did Lyft ever withdraw from any  
5 markets due to WAV requirements?

6 A. There was discussion of it for sure,  
7 but I don't remember. I can't remember us  
8 withdrawing because of WAV requirements in a market.

9 Q. To the best of your knowledge and  
10 memory, Lyft never withdrew from the market due to  
11 WAV requirements?

12 A. Yes. Lyft Classic, yeah.

13 Q. What did you mean when you said that  
14 "Brooklyn is a case study at risk"?

15 A. I don't recall.

16 Q. Is "Brooklyn" a code for the New York  
17 market according to Lyft?

18 A. Yes.

19 Q. And was Lyft forced to provide WAV  
20 services in the New York market?

21 A. I don't recall. I don't work on the  
22 initial WAV program at -- in New York.

23 Q. To the best of your knowledge, did --  
24 was Lyft required to provide WAV services in New  
25 York City?